

Director - Carl N. Crook  
Assistant Directors - Ralph W. Larson  
Ronald N. Anderson



Game Commission

Arthur S. Carter, Chairman  
James R. ...  
Elmer G. ...  
Claude Belton, ...  
Glen Galbraith, ...  
Frank L. Cassidy, Jr., ...

## DEPARTMENT OF GAME

600 North Capitol Way Olympia, Washington 98504

April 30, 1975

Colonel Nelson Conover  
District Engineer  
Corps of Engineers, Walla Walla District  
Building 602 - City County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

Your draft environmental impact statement (EIS) - Lower Snake River Fish and Wildlife Compensation - was reviewed by our staff as requested; comments follow.

As you know our department, in concert with other environmental agencies of the northwest, has worked with the Corps of Engineers for more than a decade to mitigate problems associated with Snake River hydro developments. To review the conflicts and frustrations involved would serve no useful purpose here. We do think that the proposals, outlined in your "Draft Special Report for Compensation of Fish and Wildlife Losses" and discussed in your draft EIS, generally reflect feasible approaches to mitigating losses which have occurred. In all candor, we feel that mitigation rather than compensation will be the end result. The magnitude of losses and the extreme difficulty of achieving full replacement of losses in numbers and kinds of fish and wildlife affected are such that compensation is really impossible. We do recognize that the Corps sincerely tried to meet the compensation objective, as did other agencies involved. Despite these efforts, we must recognize that this objective was not and can not be realized.

We recognize the attitude of Walla Walla District Corps of Engineers to actively seek and secure involvement of public and private agencies, as well as concerned citizens. In our experience, few federal proposals have been subjected to more public scrutiny and comment than this one under consideration. The Corps is to be commended for the time and effort they expended to assure that all points of view were sought out and heard.

Comments on specific portions of your draft are included below:

## I. Description of the Proposed Action

There is additional justification for acquisition of easements on 15,000 acres of rangeland (a, I-3) because access to project lands is thereby made possible. This acquisition also compliments developments for wildlife on both public and project lands.

We emphasize that the 500 acres of land acquired in fee (b, I-3) would be generally in narrow strips flanking natural water courses. There would be little or no impact on agriculture; in fact, soil and water conservation and aesthetic benefits would be accrued, along with those gained by wildlife.

You may wish to mention (b, I-10) that it is implicit in our department's land acquisition and development program to manage public use. Our goal as to prevent damage to landowners' property, crops and other sensitive areas of concern.

## II. Environmental Setting

Some minor change in language (2, II-3) might clarify the approach to use and values of the 500-acre fee acquisition. The lands in question would have to be selected for their potential for increasing wildlife use, as well as for their existing wildlife values. Also, it would be better to state that land involved may be in agricultural production, but would be in strips generally located along natural water courses.

To be accurate, you should consider changing your designation of "brook trout" and "dolly varden" from trout to char (II-4)

In your discussion of "Threatened Species of Wildlife" (h-II-37) it may be wise to consider two items: a) whether the animal or its habitat exists in this area, and b) whether the animal or its habitat currently are found there or existed there prior to implementation of the projects. This would add greater perspective to your discussion and permit more objective appraisal of the consequences of past and future actions.

The section "Socioeconomics" (k, II-42) includes data on family income and fisheries economic values. Regarding the latter, are these annual values? Also, wouldn't it be appropriate to include some indication of values of wildlife-oriented recreation? We estimate that annual expenditures on consumptive and non-consumptive recreation relating to wildlife are about 27 million dollars in the six counties affected by the projects. (please see attchment, Table 1). These data are not specific to project-impacted lands, but they do tend to reflect socioeconomic values of and to the general area.

Though we recognize the constraints within which federal agencies must operate when assigning economic values to steelhead and resident sport fisheries, we must point out that these values are unrealistic. Criteria used are outdated and arbitrary and do not reflect the true worth of these resources (These comments also apply to IV, 27, 28.)

### III. The Relationship of the Proposed Action to Land Use Plans

Earlier, we mentioned that, because of the location and type of land which would be acquired, impacts on agriculture would be very minimal. We suggest that references to changes in land use reflect this consideration.

### IV. Environmental Impact of Proposed Action

In addition to items mentioned (d, IV-7), you may wish to add that restoration or development of riparian vegetation on denuded sites would lead to decreasing temperature of water.

The section, "Effect of Wildlife Habitat Development", (IV-19-20), while generally describing the effects of the proposed action, does need qualification. We acknowledge the benefits which are contemplated. But it must be recognized that despite all our efforts, the numbers and kinds of wildlife, which occurred under pre-project conditions, will not be restored.

Our earlier comments about socioeconomic values of wildlife could be included in this portion of your draft (IV-25).

The footnote 2/ (IV-32) should be changed to state: "Appreciative use is increasing at an average rate of 4.4 man days per year in proportion to every 100 man days of hunting use in the State of Washington".

### V. Unavoidable Adverse Impacts

Your reference (V-1) to removal of lands from the local property tax process may be misleading. If the Game Department is funded to acquire fee title to fish and wildlife lands as proposed (see p. I-9), in lieu taxes would be paid by the department at the option of the county commissioners involved. Because this issue has been raised several times, we feel it is important that it be clarified.

### VI. Alternatives

Option b., "Dam Removal", would also result in gradual restoration of habitats and the wildlife found there. Cost of mitigation would be eliminated under this hypothetical circumstance.

April 30, 1975

VII. The Relationship Between Local Short-Term Uses and Long-Term Productivity

This section is very well done. We do suggest you consider long-term aesthetic, economic and other fundamental contributions to man's well being that will result from the proposed action. The trend toward increased leisure time accentuates the need for providing the means whereby this time will yield positive values to our nation and its citizens.

Appendices

There is an error in the table (2A-Rocky Ford Creek) which refers to rearing program for Lower Snake River Compensation Plan. Size should be 2.5 per pound and number of fish, 233,000. Total poundage, 93,000, is correct.

Finally, we suggest that portions of your appendices which pertain to biota of the Snake River be reexamined and perhaps presented in another format. First, the actual geographic area should be defined. Second, distribution of species (or communities) within this geographic area would help. Third, some quantification, or other means of indicating amounts or significance, of the plants and animals listed would add meaning. Also, our previous reference to the need for distinguishing between pre and post project biota is germane, here.

Thank you for the opportunity to comment on your draft. We trust our comments will be useful to you when you prepare your final statement.

Sincerely,

THE DEPARTMENT OF GAME

*E. S. Dziedzic*

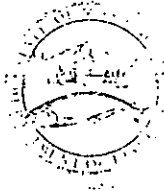
Eugene S. Dziedzic, Asst. Chief  
Environmental Management Division

ESD:jb

cc: Jack Kirkendall, Regional Manager  
Agencies

Table I - Wildlife oriented use and related expenditures for six  
S.E. Washington Counties based on 1973 harvest figures.

A c t i v i t y		Asotin	Columbia	Franklin	Garfield	Walla Walla	Whitman	Total
Consumptive Use								
Man - days		123,862	103,407	145,377	74,201	116,402	146,319	719,568
1973 Value		\$3,357,346.	\$3,006,776.	\$3,220,936.	\$2,042,936.	\$2,825,251.	\$3,873,749.	\$19,326,374.
Appreciative Use								
Man - days		131,294	109,611	154,100	78,653	123,387	165,698	762,743
1973 Value		\$1,542,705.	\$1,287,929.	\$1,810,675.	\$ 924,220.	\$1,449,797.	\$1,946,951.	\$8,962,277.
Total Use		255,156	213,018	299,477	152,854	239,789	322,017	1,492,311. man-days
Total Value		\$4,900,051.	\$4,294,705.	\$5,030,991.	\$2,967,156.	\$4,275,048.	\$1,946,951.	\$27,288,651.



DANIEL J. EVANS  
GOVERNOR

ROOM 115, GENERAL ADMINISTRATION BUILDING • PHONE 753-6600  
OLYMPIA, WASHINGTON 98504

Donald W. Moos  
XXXXXXXXXXXXXXXXXXXX  
DIRECTOR

April 2, 1975

Mr. Mike Mills  
Office of Program Planning  
and Fiscal Management  
House Office Building  
Olympia, Washington 98504

Dear Mr. Mills:

This Department has received and reviewed the Draft Special Report for Compensation of Fish and Wildlife Losses, Lower Snake River, Washington, and the Draft Environmental Impact Statement, Lower Snake River Fish and Wildlife Compensation. Members of my staff worked on previous drafts of the special report and impact statement. In the review of the previous drafts, changes were recommended by all the fishery agencies that do not appear in this draft. The most important changes that were recommended are as follows:

Draft Special Report

- p. 19, Table 6. Fish count figures were given to the Corps for the years 1968-1972, rather than the period 1954-1972, but were not used in this table.
- p. 25, Anadromous Sport Fishery. The phrase "main Snake River" should be included in the last sentence.
- p. 35, final paragraph. The following was requested to be added after the last sentence, "However, reduction in passage of fall chinook over Little Goose Dam from over 6,200 in 1970 and 6,100 in 1971 to 2,300 in 1972 and 3,200 in 1973 strongly suggests that the closure of Lower Monumental Dam in 1969 alone may have flooded out significant spawning areas. In each of these last two years more than 8,000 fall chinook were counted over Ice Harbor Dam."
- p. 36, first paragraph, 8th line. The fishery agencies requested that six turbines be changed to three turbines. The juvenile losses were calculated on the basis of three turbines.
- pp. 37-38. It was recommended that material beginning with the words, "Considering first the McNary counts..." on page 37 and continuing through the second paragraph on page 38 be eliminated from the report. The final paragraph on page 38 would begin with the word "A".

Mr. Mike Mills  
April 2, 1975  
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- p. 40, second paragraph, line 6. After the word, "information", add "such as additional losses due to peaking".
- p. 41, final paragraph. The following sentence was recommended as the final thought in this paragraph: "Tailwater fishing in the project area for anadromous fish will probably grow with time, but there is no doubt a stream fishery has been lost."
- p. 43, first paragraph. Add to the final sentence, "as suggested by the fishery agencies".
- p. 87, paragraph d. This Department has requested numerous times that the sentence reading, "Operation and maintenance would be funded through future appropriations to the U.S. Fish and Wildlife Service", be changed. We request that funding for operations and maintenance be made directly to the managing state agency responsible for hatchery operations.

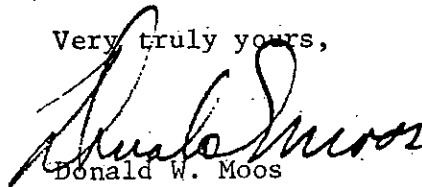
Draft Environmental Impact Statement

- p. 1, Description of Action, 9th line. After "streambank access on" insert the words "the Snake River".
- p. 1, Environmental Impacts, 1st line. Change the word "increase" to "restore".
- pp. 1-2, paragraph d, 2nd sentence. Request that operation and maintenance of the hatcheries be funded through direct appropriations to the managing state agency responsible for hatchery operations.

We concur with the impact statement that optimum fish populations cannot be maintained without compensation action and that construction of the hatcheries will have an insignificant environmental impact. We urge that total implementation of the recommended action for fisheries be authorized and initiated at the earliest possible time.

We appreciate the opportunity to review these draft reports.

Very truly yours,

  
Donald W. Moos  
Director

cc: CBFTC Members  
Col. Nelson Conover, District Engineer  
Walla Walla Dist.

wildlife, the basis of this project would seem to ask us to believe that the existing game animals along the Snake River simply stood in place and let the water rise around them and drown them as the pools behind the dams were filled. All game animals that were there before still exist. Not only is this wildlife presently available for consumptive and non-consumptive use by recreationists, but also it is now more accessible in that the property wherein the game lives is now owned by the Federal Government and open to public use. Obviously, before the construction of the dams and the condemnation of the property around the pools, this property was held by private land owners and in some instances closed to trespass.

Any damage to the migratory runs of steelhead and salmon may be more easily and economically mitigated than the project contemplated herein. Technology exists today to protect the migrating smolts. Floating deflectors and revolving screens have been used successfully to protect these young fish from the intake ducts of the turbines.

Where none existed before the development of the Lower Snake River Project, extensive and expensive state and federal parks have been developed along the Snake River. These parks are attracting thousands of people annually. They are the direct result of the Lower Snake River Project and, do, in our view, mitigate any damage which may have been done to sport recreation in Southeastern Washington.

This entire project is placed upon a faulty premise of extensive and serious losses to the fish and wildlife in the Lower Snake River Area. The question then logically emerges as "Why, then, does this project exist?" There are subtle



forces at play which we feel are the real motivating factors behind this entire exercise. The local Department of Game has, by long standing tradition, ineptly managed the game resources of this area and insulted and affronted the local land owners. Over the years this has resulted in the closure of private lands to trespass in the name of recreation. Since the local Game Department has no power to condemn private property and therefore perpetuate their own ineptness, they have enlisted the help of the U.S. Government. There are no willing sellers, or, at least, very very few, as contemplated in this ridiculous proposal.

The honest citizens and farmers who are being subjected to this defense activity against their own government then wonder if their lands will eventually be condemned simply to propagate the original mistake that is being made by starting this Mitigation Project.

#### LACK OF PARTICULARITY IN STATEMENT

The Draft Environmental Impact Statement does not comply with the National Environmental Policy Act or the State Environmental Policy Act because of its lack of particularity. The National Environmental Policy Act and the State Environmental Policy Act contemplate and intend that an Environmental Impact Statement will be prepared before any major governmental action is taken. The intent and purpose of these acts is that the public shall be made aware, in particularity, of the proposed action of the government, especially in relation to any possible environmental impact of such actions. The subject statement is not sufficient to meet the

DRAFT ENVIRONMENTAL IMPACT STATEMENT  
LOWER SNAKE RIVER FISH and WILDLIFE COMPENSATION

Published by U.S. Army Engineer District

Walla Walla, Washington

February 1975

COMMENTS BY:

CHARLES H. THRONSON  
ATTORNEY FOR ELMER DERUWE AND OTHERS

Charles H. Thronson  
Attorney at Law  
116 N. Third St.—Phone 382-4575  
Dayton, Washington 99328

DRAFT ENVIRONMENTAL IMPACT STATEMENT  
LOWER SNAKE RIVER FISH and WILDLIFE COMPENSATION

Published by U.S. Army Engineer District

Walla Walla, Washington

February 1975

COMMENTS:

ENTIRE PROJECT INVALID BECAUSE BASED UPON FAULTY PREMISE

This entire project is based upon assumed serious losses to fish and wildlife resources of the Lower Snake River Area occasioned by the construction of four dams therein. While there may have been some damage to these resources, the contemplated reaction to that damage approaches the ridiculous.

An analytical report has apparently been made by the Walla Walla District of the Corps of Engineers which purports to measure damage and recommend compensatory measures. This report has ostensibly been held for public review; but, in effect, the preparation of this report and recommendations therein included have been constructively concealed from the general public. While we may concede that there has been some damage to the salmon and steelhead runs of the Snake River due to the building of these dams, we do not concede that all the measures contemplated in this project are appropriate for mitigation of the fish damage. As to any possible damage to

March 26 1975

Dear Colonel Connor

I appreciate your sending  
me the copy of Draft Environmental  
Statement for the Snake River Fish  
and Wildlife Compensation. Have  
read the book and also article.  
Think it is a good plan. I hope  
your Department will accept some  
of the funds to complete what is planned  
in the project. In the statement  
there does not seem to be enough  
planned to deal with lost fishing.  
Many of the lost fishermen say  
the fishing has gone down with  
as a result of the dam. I believe  
on the dam pools tree stamps could  
be considered in bags and coir  
to improve the lost fishing. This  
is being done by the Columbia River

Bass Club with good success in  
several lakes in the Basin. Bass  
could be taken from several ponds  
in the McNary wildlife project  
and transplanted to the ponds  
behind the Snake dam. I do not  
agree with the views of J. R. Burr  
WSU on game and stocking. My  
hunting the past 10 years has  
been on McNary and Sunnyside  
Wildlife recreation area. Also  
about the areas planted by the  
Washington Game Dept in the  
Horner area below Finley and  
Rengold. I have very enjoyable  
hunting at all these places. In  
a year with a very poor hatch  
of birds there is not very good  
hunting even in areas of good  
cover. With planted birds there  
are always birds for the week  
end hunter. These areas are a  
little easier for hunters without  
dogs. I would like to see the

eastern cottontail rabbit established  
along the Snake river. I have found  
in the area from Prosser to Henry  
side that cottontail provides better  
and sparter shooting. This animal  
is much larger than the small  
desert cottontail found in the Columbi-  
a basin and the area along the  
Snake and Columbia rivers. Thanks  
again for your kindness in sending  
the book.

Sincerely

Eduard F. Naughton

P.S. If you might have a map  
showing the access roads into the  
pools along the Snake I am sure I  
surely would appreciate one.

APRIL 21, 1975.

COLONEL NELSON P. CONOVER,  
DISTRICT ENGINEER, WALLA WALLA DIST.  
U.S. ARMY CORPS OF ENGINEERS  
BUILDING 602, CITY-COUNTY AIRPORT  
WALLA WALLA, WASHINGTON, 99362

I AM WESLEY L. EAGER, PROPERTY OWNER AND NATIVE OF COLUMBIA COUNTY, STATE OF WASHINGTON. THE FEB. 1975, DRAFT ENVIRONMENTAL IMPACT STATEMENT ON LOWER SNAKE RIVER FISH AND WILDLIFE COMPENSATION, HAS DISREGARDED THE INPUT FROM LOCAL GOVERNMENT AND LOCAL PROPERTY OWNERS AND CITIZENS,

THE 1973 HEARINGS WERE HELD IN LEWISTON IDAHO AND RICHLAND WASH. SEEMINGLY FOR THE BENEFIT OF THE SPORTSMAN AND RECREATIONIST WHO ARE NOT THE PROPERTY OWNERS AND TAX PAYERS IN THIS AREA. DUE TO THIS, THE 1973 HEARINGS HAD TO BE REOPENED, TO HOLD HEARINGS IN DAYTON WASH. AND COLFAX WASH. FOR YOU TO HEAR FROM PROPERTY OWNERS AND TAX PAYERS BORDERING THE SNAKE RIVER. THESE MEETING HEARINGS WERE WELL ATTENDED AND LASTED UNTILL MIDNIGHT. THE CORPS SHOULD HAVE BUT DID NOT USE THE INPUT FROM THESE LAST TWO 1973 HEARINGS. WHY HAVE YOU TURNED A DEAF EAR TO THESE TWO HEARINGS/??? AND CORPORATE ONLY WITH THE SPORTSMAN????

PRIVATE CITIZENS HAVE HELD THIS LAND SINCE THE SETTLEMENT OF THE LOWER SNAKE LANDS. NOW THE SPORTSMEN HAVE LOBBIED AND OPERATED IN DEVIOUS WAYS TO SWING THE PENDULUM, TO HAVE THIS AREA DEVELOPED FOR NOTHING MORE THAN THEIR SHEER PLEASURE.

I AM OPPOSED TO YOUR MITIGATION PLAN, AND DUE TO THE OMISSION OF THE INPUT IN 1973, I CONSIDER THIS 1975 DRAFT INVALID.

PAGE ONE. IN THE EIS, DRAFT QUOTE.. ANOTHER ALTERNATIVE, AT LEAST IN CONCEPT, IS THE REMOVAL OF THE DAMS, end of quote. I CONSIDER THIS OUT OF PLACE, UTTERLY CHILDISH AND PERFECTLY RIDICULOUS.

3519 13th St.  
Lewiston, Idaho 83501  
April 21, 1975

Col. Nelson P. Conover  
District Engineer  
Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

I have been studying the progress of negotiations between the Corps and the Fish and Game Department of Idaho relative to mitigation of wildlife losses caused by the Lower Granite project.

As usual in our dealings with the Corps, we appear about to lose some more of what we have had in the past. This sort of thing has earned the Corps the name "Public Enemy Number One".

The Lower Granite project is an eyesore at best. Now it is proposed to add wildlife losses to the horrible appearance of the project, and to its horrendous loss of fisheries resources.

I have always wondered why the Corps insists on the ruination of America. Is it something learned in one of our educational institutions? Can it be that all the Corps can do, as some of its critics say, is to kill and destroy and ruin?

I have heard a lot of propaganda that indicates the Corps has acquired a "New Look"; that it has finally become aware of its responsibilities to the environment. Next, along comes the Lower Granite mitigation fizzle and we are right back where we started years ago.

Very truly yours,

*Morton R. Brigham*  
Morton R. Brigham

cc Senator Church  
Joe Greenley



DAYTON WASH

APR. 8, 1975.

COLONEL NELSON P. CONOVER, DISTRICT ENGINEER  
WALLA WALLA DISTRICT  
U.S. ARMY CORPS OF ENGINEERS  
WALLA WALLA WASH.

DEAR COLONEL CONOVER:

I AM ESTHER EAGER, NATIVE OF COLUMBIA COUNTY. I AM PLEASED TO BE ABLE TO SUBMIT ONCE MORE, MY OBJECTION TO BEING MOLLIFIED OR APPEASED OR GIVEN COMPENSATION, OR AS MITIGATION, FOR FISH AND WILD LIFE LOSSE OCCASIONED BY THE CREATION OF THE LOWER SNAKE RIVER PROJECT. THAT IS THE FOUR LOCKS AND DAMS. REALY WE DONT NEED MITIGATION, SINCE THE CREATION OF THE DAMS, WE HAVE MORE AND BETTER ACCESS TO THE RIVER THAN WE HAVE EVER KNOWN. BECAUSE, COLONEL A GREAT MANY PEOPLE TRAVEL TO THE SNAKE RIVER TO LOOK AND LOOK AT THE BEAUTY OF THE AREA, IT WONT BE THE SAME IF THOSE BEAUTIFUL COVES AND DRAWS ARE CLUTTERED WITH YOUR FENCES WHICH YOU SAY WILL PROTECT WATERING PLACES. REALY THERE IS MORE THAN ENOUGH WATER IN THE RIVER FOR ALL WILD LIFE.

FISH. HOW MANY OF THE FISH THAT RETURN TO THE OCEAN WILL ESCAPE THE RUSSIAN AND JAPANESE NETS??? WHO NET SO NEAR OUR COAST LINE. ALSO HOW CAN ONE KNOW THAT THE DAMS HAVE CAUSED A GREAT LOSS OF FISH?????? THERE WAS NO WAY OF KNOWING HOW MANY THERE WERE BEFORE THE DAMS WERE MADE AND SUPPLIED THEIR FISH LADDERS AND COUNTING AREAS.

GEESE. ITS A GREAT WASTE OF MONEY TRYING TO OUT GUESS A GOOSE AS TO WHERE IT WANTS TO NEST. THE OIL CANS AND THE BALED STRAW WERE NOT ACCEPTABLE. LET THE GOOSE BE THE JUDGE, IF THERE IS PAUCITY OF GOOD NESTING IN ONE AREA LEAVE IT TO THE GOOSE IT WILL FIND ONE TO ITS LIKEING.

IF ALL THE MONEY BEING SPENT ON WILDLIFE WAS USED INSTEAD TO

page 2

POLICE THE VANDALS THE WILD LIFE COULD TAKE CARE OF ITS SELF. AND WHAT OF THE LAND BEING TAKEN OUT OF PRODUCTION FOR FOOD??????? I FIND NO PLACE WHERE YOU DISCUSS THE DIFFICULTIES WHICH MITIGATION CAUSES LOCAL GOVERNMENT BY REDUCING THE TAXX BASIS AND IMPAIRING ADJACENT LAND USE . IT SEEMES THAT YOU HAVE GONE AHEAD WITH YOUR PLANES, WITH UTTER DIREGARD AS TO INPUT YOU RECEIVED FROM THE LAND OWNERS THAT WAS GIVEN YOU AT THE TWO MEETINGS OF 1973, HELD IN DAYTON AND COLFAXX JULY 24 AND 26, THESE MEETINGS WERE EXTREMEI ELY WELL ATTENDED. AND <sup>you</sup> ARE TRYING TO PLEASE ONLY THE SPORTSMEN WITH WHOM YOU MET IN RICHLAND WASH MAY 22 AND LEWISTON IDAHO MAY 24. PAGE IX- 1 AND PAGE IX\_-2 QUOTE, THESE ABOVE MEETINGS WHICH WERE PUBLIC, CAUSED THE NOTED FISH AND WILD LIFE AUTHORITIES TO REVIEW THE PLANES, THE SAME REVIEWING WAS DONE BY THE DEPARTMENT OF GAME. BUT????? AGAIN THE PROPERTY <sup>owner</sup> WAS NOT CONSIDERED. AND QUOTE, ON PAGE 1 YOU WROTE DRAFT----- FINAL ENVIRONMENTAL STATEMENT. FINAL??????? IHOPE NOT.

THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE LOWER SNAKE RIVER HAS I MUST SAY VERY ATTRACTIVE PICTURES, I WOULD CALL THEM BEFORE PICTURES WHAT OF THE AFTER PICTURES????? I CAN SEE THE AFTER PICTURE, THE HAPPY LOOKING SPORTSMAN GONE, THE GROUND LITTERED WITH FOOD WRAPPERS OF ANY KIND SMALL ENOUGH FOR THE POCKET. AND IF HE COMES UPON A FENCE TO PRIVET LAND AND CLIMBS THE WIRES??? THAT IS THE CAUSE OF LOOSE WIRE RESULT SEE OPPOSITE PAGE IV\_-21. PICTURE OF DEER(CAUGHT IN LOOSE WIRE. IN TRESIASSING ONTO PRIVATE LAND THE SPORTSMAN SCATTERS WEED SEED THAT HAVE CLUNG TO HIS CLOTH-ING, WHICH HE PICKED UP IN YOUR WEED AREAS, WHICH YOU CALL FINE GROUND COVER. OR HE CRIPPLES YOUR LIVE STOCK AND SOME TIMES KILLS THEM, WHAT EVER MOOD HE IS IN. ALL THESE THINGS HAVE HAPPENED TO US.

DONT DISREGARD THE PROPERTY OWNER WHO HAS PRODUCTIVE LAND, REMEMBER HE FEEDS THE NATION EVEN GOVERNMENT WORKERS.

from rt 2 box 9 EAGER road, DAYTON, WASH.

April 11, 1975

(Copy of letter mailed to congressmen)

Here is an obvious place to cut expenditures--an unneeded and actually hurtful proposed mitigation project on the Lower Snake River. Surely such is not required by the Fish and Wildlife Coordinating Act (48 Stat. 401 as amended). Or if it is, the Act itself needs your careful review and renovation--or it should be struck from the statute books. After the hearings in Dayton, we are convinced that efforts to enhance the fish and wildlife populations will only create more problems.

Such a land grab with its infringement on the rights of private landowners and its frightening potential for further grabbing is typical of a trend which must be reversed if our country is to survive and flourish. Those holding the hearings in Dayton gave little indication of compromise to help those adversely affected.

Dams have been built with full knowledge that the fish population would be reduced and that much land would be taken out of production, thus reducing areas for game. With the population increase, it's not realistic to think we can have hunting and fishing for all. It's a simple fact that we can't have everything; after all, buffalo hunting has been pretty poor for some time.

We are farmers who are harassed by hunters every fall. We are farmers who believe deficit spending will only lead to chaos. We are much too deeply in debt to undertake extravagantly expensive and needless projects of this sort. It is even possible that activities of sportsmen, rather than being thus encouraged, will have to be curtailed in the near future because of the littering and pollution which seem to be inherent--just as there is forced curtailment of our legitimate grass field burning! We urge a "no action" or "no funding" decision when this proposal reaches Congress.

We would also press for reconsideration and a consequent "no funding" decision on the proposed Touchet Dam. What possible justification can there be for inundating more fine farm land--for recreation? Or for flood control--when the Corps of Engineers has already accomplished extensive flood control where needed? Or for a repeat of the mitigating?

Sincerely,

*Mr. and Mrs. Wilfred Thom*  
*Box 87*  
*Dayton, WA 99328*

April 11, 1975

Colonel Nelson Conover  
Corps of Engineers  
Bldg. 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The mitigation proposal involving land acquisition, discussed in the February 1975 Draft Environmental Impact Statement, is impractical, unreasonable, and highly unsuitable in these times.

It seems very pleasing to fish and wildlife departments, specialists in these narrow fields, environmentalists, and sportsmen--although one real sportsman said at one of the hearings, "Don't give me all this easy access and hatchery-raised fish and coddled game--I'd like some challenge left!" How very unfair to go to the "centers of population" for the preliminary hearings, when it is the private possession of land and homes of rural people which is involved. (Yes, we are grateful that you granted two additional hearings, two months later upon demand of rural folk.) How very unfair, too, to "alert appropriate conservation groups to support this report," as urged in the preliminary report. How very biased to include the many pictures glorifying hunting and fishing--and to omit the more-readily available pictures of 1) the Monday morning mess of beer bottles, papers, cardboard boxes, cans, open gates, broken and trampled fragile ground-cover (the "multiple-use concept" in action); and of 2) old people being harassed by government men pushing them to become "willing sellers." The willing-seller concept is much too easily subject to human abuse.

We encourage further carefully made but simple and inexpensive plans for development of the already-federally-owned project lands (continuous strips on both sides of this 150-mile stretch of river!) as given in Appendix VI, pp. 18-106 (but advise correction of reference to non-existent "page 125"). We deplore failure to mention the number of those already-federally-owned project acres along the river, however, feeling that this was a purposeful omission; we understand that it approaches 25,000 acres, which figure would tend to diminish the alleged need for more land. We deplore, also, failure to indicate on the maps the expensive camping facilities already developed on project lands, here again because these elaborate facilities would diminish alleged need for more land and money.

Potential for expansion is terrifying. On pp. 18-22 repeated reference to "control of grazing on adjacent lands" is finally dismissed as "beyond the scope of this report.../but/ may be considered in the future." (Colonel Conover, you have promised

page 2

to strike any reference to control of adjacent lands, but you will move on and be succeeded by Corps personnel not bound by your personal promise.) There is the stated intention on p. I-3 to ask for initial funding for so-many acres with authorization to acquire more acres later. The "grasping" ramifications are unbelievable: although the Walla Walla River is not a tributary of the Snake, pictures and other references to the Walla Walla clearly include it as part of the "project area"; in repeated references to the states of Idaho, Oregon, and Washington (such as on pp. II-37 and II-38) those entire three states become synonymous with and are used interchangeably with "project area."

Potential for expense expansion is also terrifying: estimated cost in the 1973 draft was \$40,264,000, with annual O & M of \$2,534,500; estimated cost in the '75 draft is \$47,972,319, with annual O & M of \$3,071,000.

We've all lost, with the building of the dams--fish and game and scenery and farmland--but no one speaks of a 100-year compensatory program for the farmer's lost income potential on now-inundated land and homesteads and power-line infested fields. The entire mitigation concept is untenable--simply because it has no end! ... True, we've gained the needed power, but all of us have gained, and that includes the sportsman.

We know that you, Colonel Conover, would honor your courteous responses made at the Columbia County Commissioners' hearing this spring. Should this entire proposal be endorsed by Congress three of your commitments could mitigate a few great hurts, to a tiny degree, at least: striking reference to control of adjoining lands, obtaining approval of county planners before making major land purchases, and granting satisfactory waterhole access to Ben Dickinson and many other cattlemen in like situations.

But we are writing our congressmen urging "no action" or "no funding." We had been told at one of the hearings that the Corps of Engineers is required by law to "mitigate," but the latest report grants three possible alternatives to the proposed plan, one of which is "no action." And this is our strong recommendation. The mood of the taxpayer, of the landowner, of the food-conscious consumer, and of the private citizen must not permit this outlined land acquisition proposal.

Sincerely,

*Mr. and Mrs. Wilfred Thorn*

Mr. and Mrs. Wilfred Thorn  
Box 87  
Dayton, WA 99328

Box 152  
Dayton, Washington  
99328

April 21, 1975

Col. Nelson P. Conover  
Corp. Engineers  
Walla Walla, Washington

Dear Col. Conover:

As a taxpayer in Columbia County and a lifelong resident here, I feel there is no need for mitigation procedures as proposed at this time.

Yours truly,

*Mrs. Kennard L. Literal*

Mrs. Kennard L. Literal  
Box 152  
Dayton, Washington

Waitsburg, Wm.  
April 2, 1975

Dept. of the Army  
Walla Walla Dist.  
Corps of Engineers

Dear Sirs:

After reviewing the Draft Environmental Impact Statement on Lower Snake River Fish and Wildlife Compensation, I feel very strongly in opposition to the proposed cost estimate of \$47,000 plus for spending for lands.

I am more in favor of directing the efforts toward the lands that are already under Corps Control, rather than acquiring more.

A very concerned land owner  
and taxpayer.

Sincerely

Joe Abbey

Rt 2 Box 33  
Waitsburg, Wm.  
99361

Star Route  
Pomeroy, Washington  
April 13, 1975

RE: ENVIRONMENTAL IMPACT STATEMENT LOWER SNAKE RIVER REPORT  
FOR COMPENSATION FOR FISH AND WILDLIFE LOSSES

Colonel Conover  
U.S. Army Engineer District  
Walla Walla, Washington

Dear Colonel Conover,

In your impact statement (above), you say that the major impact will be to increase the population of fish and wildlife to offset the loss resulting from the dam construction. I will agree that the salmon runs have been ruined on the Snake River. However, there may have been no loss of other wildlife - the report on the loss of deer and birds is a complete falsehood. I live on the Snake and the wildlife is still here.

Your dam construction has covered my 600 acres of irrigated ground and cost this one ranch the summer pasture for 600 cows. This has made me cut my herd in half - 300 calves x 500 pounds equals 150,000 pounds of beef a year lost to consumers. Now you are going to fence my four miles of Snake River water for bird and deer habitat. In Wildlife Habitat 21s you give me one 25 foot lane through your shoreline for stock water. Imagine, if you can, 300 cows and calves on a hot day all trying to use this one water hole. At present, there are twelve (12) water holes along this four miles to give proper distribution of cattle and grass.

You told us that you would omit the part about controlling the grazing on land adjacent to your project land and I hope to see this done.

I do not like the tone of this report. The State Game Department has lost their right of condemnation and when they team up with the Corps of Engineers, which still can condemn, it looks like the private land owner is about to give more yet to the Game Department.

I would like to see our government file an impact statement on the affect on private land owners and to compensate the private landowners for their losses which, unlike game losses, are real and proven losses.



Your Fish and Game project will cost \$47,972,319.00. The yearly maintenance will cost \$3,071,000.00.

Spend the same amount on compensation to Lower Snake River private land owners.

Thank you.

Sincerely yours,

Benton L. Dickinson

*Benton L. Dickinson*



# STATE OF IDAHO

DEPARTMENT OF WATER RESOURCES

STATE HOUSE BOISE, IDAHO 83720

May 16, 1975

Nelson P. Conover  
District Engineer  
Walla Walla District  
Corps of Engineers  
Bldg. 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The Idaho Department of Water Resources is pleased to comment on the February, 1975 Draft Environmental Impact Statement for the Fish & Wildlife Compensation Program on the Lower Snake River. I apologize for the tardiness in providing you with our comments and hope they will still be considered in any subsequent version of the Statement and in further planning for the project.

We fully support the need to compensate for fish and wildlife losses resulting from the construction of multi-purpose water resource development projects on the Lower Snake River.

Mr. Paul Fredericks of your staff is a member of the Idaho State Study Team, which is involved in the formulation of a State Water Plan and the Idaho portion of the Pacific Northwest River Basins Commission's Comprehensive Joint Plan. The State Study Team provides an excellent opportunity for a multi-disciplinary approach to the environmental, economic and social impacts of various alternative compensation plans. Every effort should be made to coordinate this type of study effort through the State Study Team to insure that the final plan is part of the State Water Plan and the Commission's Comprehensive Joint Plan.

We suggest the possibility of improving natural reproduction by a program which would provide for the improvement of existing habitat also be considered. For example, Potlatch River, Lawyer Creek, Cottonwood Creek and others draining the Palouse and Camas Prairies could produce more fish if improved land management and stream rehabilitation were provided. An evaluation should also be made to compare the overall effectiveness of a large hatchery as compared to several small hatcheries.

I appreciate the opportunity to comment on this report.

Very truly yours,

  
R. KEITH HIGGINSON  
Director

RKH:mjr

cc: Board Members



CECIL D. ANDRUS, Governor

COMMISSION

PETE THOMPSON, Sandpoint  
PAUL C. KEETON, Lewiston  
JOHN EATON, Cascade  
JACK HEMINGWAY, Sun Valley  
H. JACK ALVORD, Pocatello



JOSEPH C. GREENLEY  
Director

## IDAHO FISH AND GAME DEPARTMENT

April 9, 1975

POST OFFICE BOX 25  
600 SOUTH WALNUT STREET  
BOISE, IDAHO 83707

Colonel Nelson P. Conover  
District Engineer, Walla Walla District  
U. S. Army Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The Draft Environmental Impact Statement and Special Report for the Compensation of Fish and Wildlife Losses at the Lower Snake River Project have been reviewed and the following comments are submitted:

### GENERAL COMMENTS

We are in general agreement with the fishery compensation measures described and their related impacts. As near as we can determine, the Special Report and Draft Environmental Impact Statement lack any reference to wildlife losses and compensation in Idaho.

### SPECIFIC COMMENTS

Special Report - The wildlife habitat losses occurring in Idaho are not addressed in this report. None of the recommended wildlife compensation measures provide any relief for wildlife losses that have occurred in Idaho.

Idaho's wildlife losses should be described and compensation measures to offset these losses included in the report.

Summary Section - Paragraph 3a: Suggest inserting "remaining" between "the" and "populations."

Paragraph 3b: The increased use of wildlife habitat areas by hunters and fishermen could also reduce trespass, littering and indiscriminate shooting on adjacent or nearby private lands.

Colonel Nelson P. Conover  
Page 2  
April 9, 1975


Pages 1-2 to 1-4: There appears to be no consideration of compensation for Idaho wildlife losses in the described measures. Compensation for these losses should be addressed.

#### RECOMMENDATIONS

Compensation of losses addressed in the Draft and those additional ones we have pointed out are absolutely essential to the affected fish and wildlife populations. The environmental impacts of not compensating for these losses far outweigh the impacts of the proposed compensation. Every effort should be made to implement a compensation program that will truly restore fish and wildlife resources to their former levels as soon as possible.

Sincerely,

DEPARTMENT OF FISH AND GAME

  
Joseph C. Greenley  
Director



ROBERT W. STRAUB  
GOVERNOR

STAFFORD HANSELL  
Director

AN EQUAL OPPORTUNITY EMPLOYER

## EXECUTIVE DEPARTMENT

### INTERGOVERNMENTAL RELATIONS DIVISION ~~LOCAL GOVERNMENT RELATIONS DIVISION~~

240 COTTAGE STREET S.E.

SALEM, OREGON 97310

May 9, 1975

Colonel Nelson P. Conover  
District Engineer  
Department of the Army  
Walla Walla District  
Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 97362

Dear Colonel Conover:

Re: Compensation of Fish and  
Wildlife Losses  
PNRS #7503 4 320

Thank you for submitting your draft Environmental  
Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state  
agencies. The State Fish Commission offered the attached  
comments which should be addressed in the preparation of  
your final Environmental Impact Statement.

We will expect to receive copies of the final  
statement as required by Council of Environmental Quality  
Guidelines.

Sincerely,

William H. Young  
Administrator

WHY:lm  
Attachment



# OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

## STATE CLEARINGHOUSE

Local Government Relations Division  
240 Cottage Street S.E., Salem, Oregon 97310  
Ph: 378-3732

RECEIVED  
MAR 24 1975  
FISH COMMISSION

### PNRS STATE REVIEW

Project #: 7503 4 320

Return Date: APR 7 1975

#### ENVIRONMENTAL IMPACT REVIEW PROCEDURES

1. A response is required to all notices requesting environmental review.
2. OMB A-95 (Revised) provides for a 30-day extension of time, if necessary. If you cannot respond by the above return date, please call the State Clearinghouse to arrange for an extension.

#### ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- ( ) This project does not have significant environmental impact.
- ( ) The environmental impact is adequately described.
- (☒) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement regarding this project.
- ( ) No comment.

#### REMARKS

See attached joint comments of Fish and Wildlife  
Commissions.

Agency

Fish

By

B. H. Lane

COMMENTS ON FISH AND WILDLIFE COMPENSATION  
ENVIRONMENTAL IMPACT STATEMENT FOR LOWER SNAKE RIVER

by the Fish Commission of Oregon  
and Oregon Wildlife Commission

Our first comments will deal with the Draft Special Report for Compensation of Fish and Wildlife Losses which is the basis for the Environmental Impact Statement. We are limiting our comments to changes mutually agreed to by representatives of the Corps (Walla Walla District and North Pacific Division), NMFS and FCO at a meeting in Portland on April 1, 1975.

Special Report

Page 19. It was suggested that the first two lines of Table 6 be given for the more representative years of 1968 to 1973, rather than the years given in the table.

Page 35. It was suggested that the last paragraph be rewritten to reflect more recent evidence of the spawning population of fall chinook in the project area.

Page 36, lines 6-10. It is incorrectly stated that the "15 percent loss rate at each project....assumes that all six turbines are installed and will be operated to pass the bulk of the available water and juvenile fish during the downstream migration season." Actually, the 15 percent loss was based on an average spill of about 50 percent of the water which would generally be the case with three turbines operating. With six turbines operating and all water passed through the powerhouse our

best estimate of total mortality would exceed 30 percent. We request that this error be corrected.

Page 36, lines 24-29. It was agreed that any reassessment of losses would include adverse effects due to increased mortality of downstream migrants passing through six turbines and losses due to increased peaking operations as well as beneficial effects due to screening turbines or transporting juveniles around the dams.

Page 37, last paragraph and Page 38, first 17 lines. It was agreed that these two paragraphs should be omitted since the point developed by them is based on a misconception.

Page 40, line 20. After "Dworshak Hatchery," insert "and adverse effects of expanded powerhouse and increased peaking operations." This is in conjunction with comment on page 36, lines 24-29.

Page 44, line 4. Omit sentence "During the detailed...design levels." This is also in conjunction with comment on page 36, lines 24-29.

Page 45, lines 13-15. Omit sentence "During the detailed...might occur" for same reason.

Page 46, last sentence through line 4 of page 47, should be omitted for same reason.

Page 87, last line. After "Dworshak returns" insert, "and adverse effects of expanded powerhouse and increased peaking operations."



PACIFIC NORTHWEST REGIONAL COMMISSIONComment:

This comment reflects the general views of the Pacific Northwest Regional Commission, Oregon Fish and Game Department, and the Department of Agriculture: These agencies believe that the willing-seller concept would best serve to meet the requirements of the fish and wildlife compensation plan.

Response:

The Corps of Engineers believes that it must have the assurance of fulfilling its obligations under the Fish and Wildlife Coordination Act. Such assurance can best be obtained through the normal Federal land acquisition procedures. Therefore, the Corps will propose to Congress the use of these procedures, including authority to condemn property for fish and wildlife compensation.

Comment:

The states have demonstrated competence in fish propagation and have operated other hatcheries efficiently. Fish propagation, planting and harvest management consideration, as well as the legal responsibilities for these functions make it imperative that the state be designated as the operator.

Response:

The Corps agrees that the state agencies have the capability and should be designated as operators of the hatcheries constructed under the Lower Snake River Compensation Plan. We feel, however, that the Fish and Wildlife Service, as the Federal agency responsible for preservation and enhancement for fish and wildlife, should be the agency to assume budgetary responsibility for operation of the hatcheries with the costs chargeable to the four Lower Snake River projects.

Comment:

The proposal that operation and maintenance funding for fish hatcheries should be from the budget of the Department of Interior is insecure. We believe the mitigation of damage to fisheries is a Corps responsibility and a continuing obligation of that agency.

Response:

Please refer to the response to the proceeding comment.

ENVIRONMENTAL PROTECTION AGENCY

Comment:

We have completed review of the revised draft environmental impact statement on the Lower Snake River Fish and Wildlife Compensation Plan. Our review of the revised document shows that the questions raised regarding mitigating costs, omission of non-hatchery mitigation and treatment of hatchery waste in our April 9, 1975, letter have been adequately answered.

The Environmental Protection Agency has recently received several letters addressing the question of eminent-domain. Your transmittal letter accompanying the revised draft EIS indicates that you are aware of the deep concern of local land owners regarding this matter.

Our comments on this statement have been classified LO-1, LO (Lack of Objections) 1 (Adequate Information). The classification and the date of the Environmental Protection Agency's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our review on proposed Federal actions under Section 309 of the Clean Air Act, as amended.

Response:

Noted.

UNITED STATES COAST GUARD

Comment:

This is in response to your letter of 27 April 1976 addressed to Secretary Coleman concerning a revised draft environmental impact statement on Special Report - Lower Snake River Fish and Wildlife Compensation Plan, Washington and Idaho.

The concerned operating administrations and staff of the Department of Transportation have reviewed the material submitted. We have no comments to offer nor do we have any objection to this report.

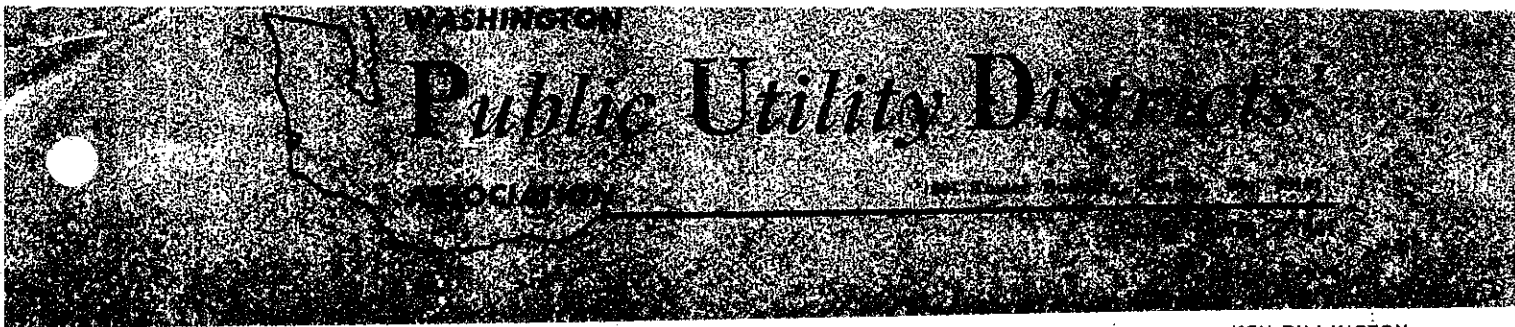
Response:

Noted.

UNITED STATES DEPARTMENT OF THE INTERIOR

Comment:

We wish to reiterate a concern previously expressed by the Fish and Wildlife Service. The proposed fish and wildlife measure will not "compensate" for project-caused losses. The measures will only



KEN BILLINGTON  
EXECUTIVE DIRECTOR

August 29, 1975

Nelson P. Conover, Colonel, CE  
District Engineer  
Department of the Army  
Walla Walla District, Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

Thank you for your letter outlining background and further information concerning the proposed added debt to be placed on the Pacific Northwest electric ratepayers to cover mitigation costs to offset estimated losses to fish and wildlife occasioned by the construction of the four lower Snake River dams.

I repeat what was stated in my first letter, i.e., this type of activity is excellent from a society standpoint. We should try to maintain and extend our fish and wildlife resources, even though they are primarily for the recreational benefit of the few. However, it is our position that such activity should not be financed through the electric power bill, over and above the amount necessary to cover the justified mitigation costs of fish and wildlife losses directly attributable to the construction of a power project. Thus, you have a third faction, the ones who pay the bill, to contend with in your report besides the fish and wildlife representatives and the land-owners, both of whom seem to have received top priority in progress to date.

My reaction to your letter by each sub-item's reference is as follows:

a. Certainly it is understandable that construction of dams does have an effect on salmon and steelhead. Therefore, it has been an accepted practice for hatcheries to be paid for by power users and provided to offset any estimated supposed fisheries losses. What is not understandable, however, has been the location of these hatcheries. If there is a continuing problem caused by passage of fish over or around dams, then it would seem more logical to construct any replacement hatcheries below the dams on the Columbia/Snake Rivers' system if our main purpose is to maintain the Columbia River fisheries as a food resource. It appears wasteful of funds to try to maintain upstream fisheries at a substantial cost to the many just to provide recreational pleasure to a few.

"PUD's— *Utility Service Of, By and For the People.*"

August 29, 1975

b. It is beyond my comprehension how the raising of water along the banks of the river, by means of a reservoir, changes the characteristics of access for steelhead fishermen to such an extent that you must acquire by fee extensive parcels of land from which they may now wade or launch boats into the water. What did they do for this access before the dams were built?

c. Certainly, development of wildlife habitat on project lands is proper because all useful lands including project lands should be available for such development.

d. The reservoir may flood some of the existing draws, but surely the same draws are in the same relative position as regards public roads as before construction of the dams. If hunters got to the water before the dams were built they should be able to get there after the dams are built without extensive leasing of lands at a cost to the electric ratepayer.

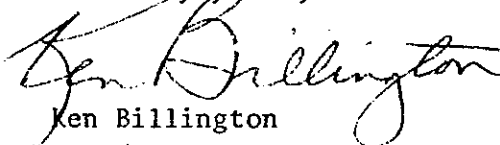
e. Buying of lands for a "hunting preserve" is not justified. Having been born and raised in the woods and spending considerable time in logging camps, I have found that Mother Nature can make adjustments in the relocation of nests, feeding areas, etc., for wildlife to a better extent and at considerable less cost than man. Land has been inundated by reservoir water, but the wildlife has not been drowned out to the extent where a special hunting preserve is justified. Following the principle being proposed here, every city in this Nation should require their taxpayers to furnish money to go out and acquire game lands for every square foot of concrete which has been poured for the "compensation of game animals and hunter opportunity not provided on" city lands. The quote portion is from your letter.

f. To require the electric ratepayer to finance a game bird farm to stock the "compensation lands" referred to in item "e" is outrightly unfair.

As you can see by my comments what you are proposing will be commented on to the fullest extent possible. I feel confident that as the electric rate-paying public becomes aware of this type of financial raid on electric rates they also will fully reflect their views to our Congressional delegation.

We will look forward to obtaining a copy of your final report, and will be submitting more detailed comments to both the Chief of Engineers as well as our Congressional delegation when this matter is considered.

Sincerely yours,

  
Ken Billington

cc: Don Hodel, Administrator  
Bonneville Power Administration  
State of Washington Congressional  
Delegation  
Henry Curtis, N.W.P.P.A.

Letter to Col. Conover, Subj: Special Report and Draft Environmental Statement on the Lower Snake River Fish and Wildlife Compensation Plan

4. The estimation of the angler-days lost, as a result of the reduced fish runs, was hazy and should be investigated further. The number of angler-days lost should be offset by the number of other types of recreation-days gained through use of the reservoirs for other water-based recreation pursuits.

The analysis presented should include calculations on the sensitivity of the final compensation figures to variance in the above underlying estimates.

Your cost-benefit analysis incorporates the use of figures whose origins have not been set forth. Specifically, while you do indicate that the user-day values used in computing your benefit-cost ratios are based on the Water Resources Council's "Establishment of Principles and Standards for Planning," dated September 1973, no attempt has been made to provide the reviewer with any justification for using these particular figures. Why, for example, are consumptive uses such as hunting given a user-day value of \$9, while appreciative uses such as photography or birdwatching are given a user-day value of \$2.25. These figures should be explained in this document. It would seem that, in view of the crucial importance of such figures to the benefit-cost ratios subsequently derived, there is an implicit obligation to provide reviewers with the logic originally employed in developing these numbers.

In addition to the above concerns, there are several assumptions contained within your cost-benefit analysis which we believe seriously question the accuracy of the figures ultimately arrived at, and which tend to bias the derived benefit-cost ratios in favor of benefits.

Your cost figures for fishery compensation facilities and wildlife compensation facilities appearing in tables 9, 14, and 15 include only the direct Federal cost attributable to the facilities in question.

While you do not explicitly set forth, as we have mentioned above, the justification behind the user-day values employed in deriving the annual benefits resulting from the fishery and wildlife compensation facilities, we assume that such values are derived from the total average expenditure per day resulting from a particular activity. For example, the user-day value for hunting would include not only the cost of a license, but also travel, lodging, equipment, and other related expenses incurred in the pursuit of that activity. In the

Letter to Col. Conover, Subj: Special Report and Draft Environmental Statement on the Lower Snake River Fish and Wildlife Compensation Plan

interest of consistency, therefore, and accurate analysis, it is necessary that all costs resulting from your proposal be included in your benefit-cost analysis, not merely direct Federal costs of building and operating the proposed compensation facilities. Costs which might warrant consideration would be increased vandalism on the part of users, greater danger of hunting accidents, and destruction due to increased usage of off-road vehicles.

Another assumption implicit in your analysis is that the various uses identified and employed in arriving at the benefit figures and benefit-cost ratios may not necessarily be additive. The maximum utilization of a given area for hunting purposes may discourage appreciative non-consumptive uses such as wildlife photography and birdwatching. This acquires added importance in view of the fact that many forms of appreciative use are on the increase both in absolute terms and in relation to consumptive uses as you have noted on pages 56-57 of the report.

Your benefit-cost analysis is somewhat inconsistent with your earlier assertions regarding the difficulty in prorating costs to specific facilities. On page 25 of the Special Report, the point is correctly made that it is impossible to accurately prorate total fish losses (an external cost) to individual hydro projects due to the nonavailability of sufficiently detailed data. A corollary to this would be that it is at least equally impossible to accurately prorate total benefits to the individual projects contained within the Lower Snake River Fish and Wildlife Compensation Plan (Table 15). This is especially true in view of the highly speculative nature of the total annual benefit figure contained in Table 15.

The alternatives are shortsighted. The "no action" alternative doesn't really discuss the ultimate effects of this alternative, e.g. "the no-action alternative would not increase the population of game and non-game species to their previous levels." But there is no discussion of the resultant effects--will hunters shoot something else, will the hunting industry suffer setbacks, etc.

There is no discussion of impacts of dam removal to the river. Although this is unrealistic, it is nevertheless an alternative which should be considered.

The report only briefly discusses transport of fish past the dams by truck; there is no mention of other viable alternatives, including:

Letter to Col. Conover, Subj: Special Report and Draft Environmental Statement on the Lower Snake River Fish and Wildlife Compensation Plan

- (1) Partial mitigation, i.e., bringing the fish runs up to 50, 75, or 80 percent of the base level;
- (2) Optimizing one or more kinds of fish, i.e., chinook to the exclusion of steelhead; or
- (3) Eliminating parts of the proposal such as the pheasant farms or fishing access.

This lack of alternatives probably stems from a vagueness in defining objectives. It is not clear from the report whether the objectives of the proposal are to return the fish and wildlife associated with the Snake River to their original state (or as close as possible), to compensate hunters and other recreationists for loss of opportunity, or to return hunting and fishing activities to approximately their original potential.

In any event, there is no clear record of the fish and wildlife situation prior to installation of the dams, thus making an accurate mitigation estimate impossible.

During the past several years, much money and effort have been expended to mitigate losses of fish runs; for instance, devices to reduce supersaturation of nitrogen, fish ladders, transportation of young fish by special truck, and fluctuation in streamflows. We expect these efforts to continue. We, therefore, believe that these mitigation efforts should be costed out and credited against the compensation figures proposed in your reports.

In addition to our comments, we would like to pose the following questions which we believe the Corps should respond to in its reports:

1. What are the current total annual costs of proposed fish and wildlife compensation measures?
2. What is the basis for allocating such annual costs?
3. Are the measures recommended in the Special Report adequate by themselves to compensate for fish and wildlife losses?
4. Does the Corps plan to embark on a combination plan encompassing measures proposed in the Special Report combined with spillway deflectors and transportation? If so, the combined beneficial effects as well as the combined costs of such measures should be analyzed in developing the compensation plan.

Letter to Col. Conover, Subj: Special Report and Draft Environmental Statement on the Lower Snake River Fish and Wildlife Compensation Plan

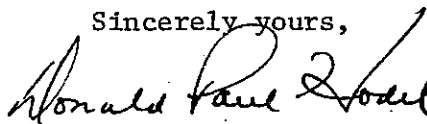
5. What would be the annual costs and anticipated benefits if an alternative of spillway deflectors and expanded collection and transportation program were to be adopted?
6. What criteria does the Corps propose to use to ascertain whether the construction of facilities is in excess of a compensatory measure? During discussion in August, the Corps stated that facilities for enhancement of fish and wildlife would not be allocated for power repayment.
7. Will wildlife development on Government lands tend to diminish the need for off-project development?

Finally, we would like to point out that under the Flood Control Act of 1944 and the Bonneville Project Act of 1937 cost allocations of Corps projects from which power is marketed by BPA must be confirmed by the Federal Power Commission. The question of whether the allocation of power of 97.8 percent at the Lower Snake projects for fish and wildlife compensation is one that should be considered by the FPC in its confirmation of the Corps' proposed allocation.

We trust that the length and nature of these comments will not be interpreted as an attempt by Bonneville to minimize a serious problem of fish losses on the Columbia River and its main tributary, the Snake. Rather, we have attempted to point out that the draft reports reviewed by us do not present a convincing picture that almost 100 percent of the compensation costs should be allocated to power and, therefore, borne by the ratepayers throughout the Bonneville Power Administration's marketing area. A much cleaner alternative would be for the Corps and the Fish and Wildlife Service to request appropriations to carry out the work deemed necessary to mitigate fish and game losses.

Since your reports, through an inadvertence which is neither the fault of the Corps or BPA, were not received by us in the course of your normal distribution, we regret that our comments are reaching you at this late date. We therefore appreciate your courtesy in allowing us to be heard at this time and ask that Bonneville's comments be taken up and made a part of the record prior to issuance of any future drafts or of your final reports.

Sincerely yours,



Administrator

cc:  
Brig. Gen. W. E. Peel, NPD  
Mr. Phillip L. Cole, NPD





OFFICE OF  
THE ADMINISTRATOR

# United States Department of the Interior

BONNEVILLE POWER ADMINISTRATION  
P.O. BOX 3621, PORTLAND, OREGON 97208

SEP 3 1975

In reply refer to: AD

Col. Nelson P. Conover  
District Engineer, Walla Walla District  
U.S. Army Corps of Engineers  
Bldg. 602, City-County Airport  
Walla Walla, Washington 99362

Dear Col. Conover:

Since receiving your Special Report and Draft Environmental Impact Statement on the Lower Snake River Fish and Wildlife Compensation Plan, Bonneville staff has not only reviewed both documents in depth, but has also held meetings with the Corps' Walla Walla District Office personnel.

We are greatly disturbed at the magnitude of the compensation measures proposed by the Fish and Wildlife Service and the Corps of Engineers, and the extent to which payment for such compensation is intended to be allocated to power revenues. Our general reaction is that while the documentation contains a great deal of detailed data, there are a number of areas where information assessing compensatory needs is either unsubstantiated or totally lacking. We believe that in view of the uncertainties involved a much more modest program would be appropriate, to be expanded only if future data and events warrant.

Even if we were to agree, which we do not, that the construction costs and O&M costs cited by you in your letter of July 18 accurately reflect the monies needed to compensate fish and wildlife losses in the area, we would still have certain basic reservations. In the first place, the construction costs allocable to the four Lower Snake dams average slightly under 83.8 percent. Instead, the Corps has, in addition to such allocation, added a specific cost to power as well as the joint-use costs ascribable to navigation and power. This questionable method, unsubstantiated in discussions with your staff, results in a conclusion that 97.8 percent of the compensation costs must be repaid by power revenues. Further, we understand that the figures cited in your letter are based on 1974 prices. By the time the plan is implemented, we may expect that the total costs will increase significantly. Based on preliminary studies by the Bonneville staff, the annual costs projected in your report would be equivalent to about 3-1/2 percent of Bonneville's total revenues last year. We estimate that your proposal would by itself necessitate a rate increase to Bonneville's customers of 2 to 3 percent.



*Save Energy and You Serve America!*

Letter to Col. Conover, Subj: Special Report and Draft Environmental Statement on the Lower Snake River Fish and Wildlife Compensation Plan

This raises an ancillary objection on our part, which is that BPA's customers, namely, public agencies, investor-owned utilities, and industries, spread over the entire Pacific Northwest, who are most adversely affected by the proposed mitigation plan, were not given an opportunity either to participate in the public meetings held 2 years ago or to review the Special Report and the Draft Environmental Impact Statement. We consider this deficiency serious enough to cast a cloud on the adequacy of your EIS.

We also have specific comments as follows:

We are concerned with the number of possible inaccuracies in the estimates of fish losses from the dams reported in the Draft Environmental Statement and related reports.

The additional compensation figures of \$46 million plus \$3 million annual operation and maintenance expenditures are based on a few key estimates concerning the fish runs in the Columbia River and hatchery costs, a change in any one of which would alter the compensation figures significantly.

In the following cases, these underlying estimates are subject to question. Admittedly, these doubts are primarily due to the fact that adequate data simply does not exist:

1. It was assumed that 15 percent of the downstream migrant anadromous fish would be killed at each dam they passed. This accumulates to 48 percent of an initial run which would be killed passing through the four dams in question.
2. The fish run, which was reduced by the four dams, was estimated using the maximum number of fish passing McNary Dam between 1954 and 1972, multiplied by the first or second highest proportion of the fish passing McNary Dam which passed Ice Harbor Dam between 1962 and 1967. The reason for using the first and second highest runs was allegedly due to the inadequacy of the counts. Since fish runs are naturally subject to extreme annual variability, this method of estimating the size of the run damaged by the four dams should be investigated further.
3. The estimated size of the hatchery facilities required to produce replacement fish are based on catch-to-escapement ratios and returns-to-spawner ratios, which are questionable.

intent and purpose of the law in that it does not describe with particularity the location of the proposed governmental action.

A reading of the Draft Environmental Impact Statement for this project points out its defect with clarity. As to the project lands, the Impact Statement is definite and clear as to what the environmental impact will be. Then the statement goes further to talk in general terms of possible environmental impacts to indefinite and unspecified property. The statement does not delineate which rivers and which property on those rivers will be the subject of this project. This vagueness and generality defeat the Impact Statement. How can local or state governments or the local citizenry be apprised or make intelligent conclusions in relation to the environmental impacts of the major governmental action when such parties cannot know where, and under what circumstances this action will take place?

The vagueness and generality of the Draft Environmental Impact Statement for this project is so deep and implicit within the statement as to constitute a violation of due process of law as contemplated by the above mentioned Environmental Acts. Such violation of the intent and purpose of the laws renders the Impact Statement invalid and a continuation of these activities affords interested parties injunctive relief through the courts.

#### CONCLUSION

The entire Lower Snake River Fish and Wildlife Project is invalid in that it is based upon the faulty premise of the

existence of serious losses to fish and wildlife resources of the area. Even if the project is based upon a premise that is worthy of notice, the Draft Environmental Impact Statement is invalid through its failure to specify the non-project land involved in the contemplated major governmental actions.

The contemplated project has created considerable concern on the part of local government and land owners. This concern has prompted many written comments by these parties to the Congress and to the Corps of Engineers. These comments are correct and worthy of close consideration by all governmental personnel involved.

Cheney Environment Center  
634 Clover  
Cheney, Washington 99004  
April 11, 1975

Walla Walla District  
Corps of Engineers  
Building 602  
City-County Airport  
Walla Walla, Washington 99362

Sir:

The Cheney Environment Center appreciates this opportunity to comment on the Draft Environmental Impact Statement for the Lower Snake River Report for Compensation for Fish and Wildlife Losses.

Our greatest objection is that "compensation" has to be made. One really begins to wonder whether these four "multi-purpose water resources development projects" are worth it. By multi-purpose we assume that they are meant to provide electricity, recreation, and irrigation water. Yet one really questions whether the energy produced before they silt up will compensate for the energy required to mine the resources for the dams and hatcheries, to build the dams and hatcheries, to power the hatcheries once built, and to power the irrigation pumps to provide water to maintain habitat that was able to maintain itself prior to construction of the dams. With respect to recreation, prior to the construction of dams on the Columbia, it was an excellent anadromous fish run. Now, because of the dams we must build fish hatcheries to supply fish which are considered to be of an inferior quality by those who have been fishing anadromous fish prior to man's interference. Because of the dams it is also necessary to try to re-establish habitat which was inundated by the rising waters in order to provide game for hunters which was also present previously. Unfortunately, observations such as these are too late to accomplish anything for the Lower Snake River, hopefully considerations such as these will be made before making the same mistakes on the Middle Snake River.

We would also like to make the following specific comments about the Draft Environmental Impact Statement.

We are pleased to see that the effluent from the hatcheries will be passed through settling ponds prior to being dumped into the river and that the sediment will be dried and used for fertilizer. As you point out, while the ultimate discharge will be small, combined with other contaminants added to the river, this small amount could make a significant difference. Bearing this in mind, we hope that a constant effort will be made to try to reduce the contaminants introduced into the waters.

With regard to providing game birds, we would find it preferable to provide suitable habitat in which they could reproduce themselves to merely stocking the areas with birds from game farms.

On page IV-21, you mention the possibility that habitat development may improve the chances of the peregrine falcon nesting in the area since its natural food, ducks, will be increased by this project. However, unless a great effort is made to educate the public there will not be much hope of the peregrine falcon making a comeback. To begin with many people feel that man is the only one who has a right to kill wildlife, and all predators are something to be eliminated. Secondly, falconers must be contended with. If a peregrine should by chance nest in the area, it would be truly surprising if the nest were not raided by someone who either wishes to swell his ego or his pocketbook. Hopefully you can succeed in changing the attitudes of people by an intensive education effort.

Again thank you for this opportunity to express our views and we hope that you will consider our comments in drafting the final EIS.

Sincerely yours,

*Lindell Steele*

(Ms.) Lindell Steele  
Wildlife Committee

7. The local landowners should be considered in regard to future programs on their lands or adjacent lands. The following programs must be considered:

- a. weed control on habitat and easement lands
- b. fire protection on same lands
- c. control of access to hunting areas
- d. consideration for crop damage payments

Funds for these programs should be considered for inclusion in the compensation plan.

The landowner should be allowed to control the number of recreationists on his property if an easement is given. It may be possible to set up registration points and only allow a certain number to enter. There will have to be some type of program to control the amount of use of the easement areas, otherwise the hunting pressure will be too great. We feel that if the landowners have some control of the amount of use on their lands, they will be much more receptive to selling easements and habitat area.

8. Strong consideration should be given to the designation of several areas as wildlife and waterfowl sanctuary areas. Consideration should also be given to landowners to establish wildlife sanctuaries on their lands if they are not interested in the easement program. This should only be considered on a few selected areas.
9. We would also recommend that Ilia be set aside as a wildlife habitat area. The proposed Corps project for housing on the Ilia bar seems to be in conflict with the Corps intentions to provide areas for hunting and wildlife habitat. This area is one of few areas which is on project lands with good habitat potential and access available. The Corps should work with the Whitman County Parks and Recreation Board to establish habitat on the proposed park land at Wawawai Bay. This could serve as a game sanctuary because the area could be so designated and it would compliment the uses of the park and increase the experience levels of the recreationists.

In summation, we feel the plan has some fine proposals; however, the plan must be readjusted to consider the areas in Whitman County. The plan in its present form also offers the opportunity for non-action, i.e. ten year limit on acquisition of habitat and easement areas, willing-seller concept, funding levels, and increased costs in the future. The program has to be firmer.

Lower Granite Dam and its project lands was the last part of the project on the Lower Snake River. Because it is the last project, the effects of the

project on wildlife are not yet apparent. These effects will soon be obvious and compensation should be planned to create habitat.

We would like to suggest that more emphasis be given to the wildlife habitat programs. The Snake River was once a unique area, plentiful with wildlife, therefore, the future is bleak without solid habitat development and maintenance programs. Monies must also be allocated for future maintenance of habitat areas.

The Whitman County Sportsmen's Association would be very willing to meet with you to discuss our comments. We prefer to work with the Corps on a constructive and cooperative basis.

Thank you for your planning efforts and please strongly consider our suggestions and comments. We would be grateful for the opportunity for future coordination and review of the compensation plan. Thank you for the opportunity to review your plan.

Sincerely,

*Michael P. Werner*

Michael P. Werner, Chairperson  
Committee to Review Compensation Plan for  
Fish and Wildlife.

MPW:sm

CC: Senator Donahue, 411-A Legislative Bldg., Olympia, Washington 98504  
Rep. E.G. Patterson, HOB 327, Olympia, Washington 98504  
Rep. Otto Amen, HOB 325, Olympia, Washington 98504  
Whitman County Commissioners  
Whitman County Regional Planning Council



# Whitman County Sportsmen's Association, Inc.

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840 Alcora Drive, Pullman, Wash. 99163

Telephone: (509) 567-3362

April 11, 1975

Nelson P. Conover  
Colonel, CE, District Engineer  
Department of the Army  
Walla Walla District, Corps of Engineers  
Bldg 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

The Whitman County Sportsmen's Association is encouraged by the general philosophies of the Fish and Wildlife Compensation Plan. Our association formed a six member committee to review and make our comments on this plan. The representation of the association membership, as well as the committee, is composed of individuals representing a diversity of occupational backgrounds. The representation is from such areas as: residents of small towns, as well as Pullman, rural residents, Washington State University faculty and staff, Washington State Department of Game personnel, and local landowners.

Our general comments of the plan are as follows:

1. We feel quite strongly that there has been a very detrimental loss of wildlife habitat along the Snake River. The Compensation Plan does allow for future compensation in some areas. However, the area most recently affected by the overall series of Lower Snake River projects, Lower Granite Dam and the area behind it, has very little compensation for wildlife. This area should receive greater emphasis in the plan due to losses as a result of road and railroad relocation, areas inundated by the reservoir, the access to the area, the heavy use of this area by recreationists. Specifically, we are referring to the area located above Lower Granite Dam in Whitman County. We do not feel it is equitable to replace losses suffered in our area with habitat in other areas. The area above Lower Granite has a twenty-five mile road along the reservoir and has the best overall access to the reservoir area as compared to other sectors along the Lower Snake River. This is the main area utilized by residents of Whitman County and many visitors to the area.
2. We strongly agree with and endorse the willing-seller concept for land acquisition in fee and by easement. However, the ten year

limit for acquisition of these areas should be eliminated. These projects on the Lower Snake River will disrupt wildlife habitat and populations as well as the recreationists use of these areas for periods far longer than ten years. The period for land acquisition, both in fee and by easement, should be extended to the length of the project's life. Hopefully, a longer period will allow for a changed of attitude by local landowners. The ten year period is not sufficient to allow for proper relationships and subsequent negotiations to develop.

3. In reviewing the projected funds for a twenty year pheasant stocking program with personnel from the Washington State Game Department, the following points were made:
  - a. the costs of such programs have increased dramatically recently
  - b. the compensation plan does not include adjustments for inflationary increases in the various programs in the future
4. The hatchery programs proposed may have many of the same difficulties which have been evident at the Dworshak fish hatchery. The water quality of the rivers at the proposed sites will likely necessitate closed water systems. We have reviewed the costs on a per fish basis for maintenance and operation only. These costs are staggering, even without adding on future cost increases. Because of the costs involved, the problems associated with, and the lack of direct benefits of these hatching programs, we would suggest a review of these plans. The fishing benefits are more for residents of Oregon and Idaho as well as commercial fishermen.
5. The Palouse River should be strongly considered for rainbow trout stocking, especially that area immediately west of the confluence of the two forks of the Palouse and the North Fork of the Palouse to the Idaho border. These areas have the best potential to support fish. These same areas contained good populations of game fish at one time. In addition, the Department of Ecology will monitor runoff from agricultural lands, primary source of pollution in the Palouse River, and work towards zero-discharge by 1985. This program should greatly enhance the Palouse River's potential for fish habitat.
6. There is growing emphasis for creating recreational opportunities for the sighting of wildlife, such as, wildlife photography, bird watching, sightseeing, and environmental study. The availability of habitat for wildlife is directly related to wildlife populations. The amount of habitat, the vegetation, and the wildlife will increase the enjoyment of all people who utilize the project lands for recreation and also increase their appreciation for the projects and help to alleviate the public's fear of adverse effects of the projects on wildlife.

WASHINGTON STATE UNIVERSITY  
PULLMAN, WASHINGTON 99163

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Office: 310 CUB  
Phone: (509) 335-1694



April 10, 1975

Colonel Nelson P. Conover  
District Engineer, Walla Walla District  
U.S. Army Corps of Engineers  
Building 602  
City-County Airport  
Walla Walla, Washington 99362

Dear Sir:

The Environmental Task Force of the Associated Students of Washington State University appreciates the opportunity to review the Draft Environmental Impact Statement: Lower Snake River Fish and Wildlife Compensation. Our comments on the document as well as our views as to the infeasibility of the fish hatchery aspects of the proposed compensation program are stated herein.

The fish compensation program ( i.e., hatcheries ) does not, in our opinion, begin to compensate for the environmental damage and the extremely high economic costs that constructing and operating such facilities would incur. The construction of hatcheries, as explained in the Draft Environmental Impact Statement ( EIS ), would cause erosion, esthetic damage, displacement and killing of wildlife, etc. The operation of the hatcheries would involve not only substantial, annual federal allocations, but would cause stream pollution ( due primarily to the discharge of wastes ) and the real possibility of accidental, damaging drug discharge into major waterways. In addition, we note ( page IV - 14 ) that 48% of the hatchery-reared fish will die due to the Lower Snake River dams alone ( obviously excluding losses at the Columbia River dams ). We therefore encourage you to abandon plans for fish hatcheries for the Lower Snake River.

Instead, we would encourage the increased compensation measures for terrestrial ( both fauna and flora ) and avian species. We note that while wildlife compensation measures would seem to generate more environmental and recreational benefits than hatcheries, the hatcheries have received more attention by the Corps of Engineers in the Draft EIS. We believe that efforts to restore wildlife habitat should receive much more attention, time and funding than the hatcheries.

Colonel Nelson P. Conover  
page 2

In addition, we would strongly encourage the Corps of Engineers to formulate definite plans for wildlife habitats along the Whitman County shores of Lower Granite Reservoir. Such habitats would help to compensate for wildlife lost from Whitman County due to the recent construction of the Lower Granite Dam and the local, attendant road and railway construction. The Whitman County shores are utilized by citizens of Moscow, Pullman, Lewiston and Clarkston -- among the most densely populated areas within the geographic scope of the Lower Snake River Fish and Wildlife Compensation Program. We can not help but note that while the Snake River shores of Garfield, Asotin, Franklin and Columbia Counties seem rife with wildlife compensation measures, the Whitman County shores of Lower Granite Reservoir seem purposely neglected. If there are reasons to believe that the original wildlife along the shores of the other Lower Snake River reservoirs was more extensive than along the Whitman County shores of the Snake River, then the Draft EIS should state them. Otherwise, wildlife compensation measures ought to be increased for the north shores of Lower Granite Reservoir to bring that area's wildlife compensation measures in line with those of other areas along the Lower Snake River.

The Environmental Task Force would also like to advise the Corps of Engineers of the existence of the Washington State Register of Historic Places and of the Washington State Historic Preservation Inventory. Both are maintained by the Office of Archaeology and Historic Preservation of the Washington State Parks and Recreation Commission. Sites along the Lower Snake River are included on each and ought to be considered in Corps of Engineer planning processes. In Whitman County such places as the H. H. Spalding grave site at Almota and the Granite Point are on these listings.

Again, we appreciate the opportunity to review this Draft EIS and wish to commend the Corps of Engineers for the frankness of some portions of the document ( e.g., page IV - 16 ).

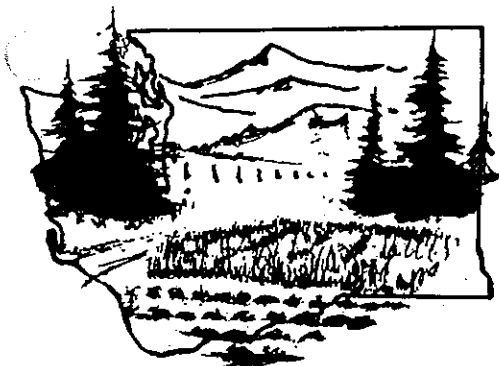
Sincerely yours,

*Nicholas F. Manning*

Nicholas F. Manning

ASWSU Environmental Task Force

cc: Honorable Thomas S. Foley



# washington state farm bureau

111 W. 21ST PO. BOX 2569, OLYMPIA WASHINGTON 98507  
TELEPHONE (206) 357-9975

April 1, 1975

Nelson P. Conover, Colonel  
Department of the Army  
Corps of Engineers  
Building 602, City-County Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

Once again Washington State Farm Bureau wishes to express its appreciation for the opportunity to express some thoughts and views on the "Draft Environmental Impact Statement" for the lower Snake River on fish and wildlife compensation.

In a quick appraisal of the impact statement, there are at least three areas that WSFB does not feel have been adequately studied and the impacts thereof analyzed. They are (1) loss of tax base on local and state governments, (2) the impact on the local farmer/landowner and his operations, and (3) the reduction of the production of food and fiber resulting from restrictions placed on the producer and some land becoming non-agricultural to recreational. Each will be discussed in turn.

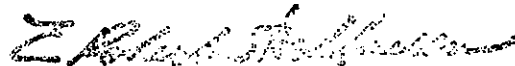
(1) Loss of tax base: Presently, the legislature of the State of Washington is in session with a monumental task of writing a state budget. State governments are continually in search for more funds with which to operate state governments. Also several laws are being passed or considered that have a fiscal impact on local and county governments. The question then becomes - Can our local, county and state governments afford to lose any more tax base (i.e., acquisition of private lands by state and federal governments) on which most of the local and county governments depend? This question has not been discussed in the report in any manner -- A glaring error.

(2) Impact on farmer/landowner and his operations: The supposed loss to the sportsman and to the environmentalist is the main theme of the entire report. Not once is the loss to the farmer/landowner addressed nor are the rights of private property owners given any consideration. The entire statement ignores the side of the farmer/operator and assumes that the greatest overlying need is for compensation for fish, wildlife and waterfowl as if they had feelings the same as human beings. Of course, the push is, as stated before, from sportsmen and environmentalists. The actual cost to the farmer to comply with the regulations, to have the general public be given access rights to his property and other requirements such as fencing waterways, bird and game habitats is not given any study either. Finally, the "willing seller-willing buyer" concept sounds good, but in fact does not operate that way. Rather, when the government wants the land, it takes it or imposes such restrictions upon the landowner that he must become a "willing seller".

(3) Production of food and fiber: Our American farmers and farmers within the State of Washington must be encouraged for increased production to feed and cloth a hungry nation and world. Citizens of the state have spoken loud and clear regarding their wishes for the future of Washington State through the Governor's "Alternatives for Washington" program. They want an agriculture orientated economy. The proposed report goes a long way in restricting a viable agricultural industry in southeastern Washington.

Colonel, I trust that you will give due consideration to my remarks and will work with the members of Walla Walla and Columbia County Farm Bureaus to resolve some of these problems in a manner acceptable to all. Washington State Farm Bureau will assist any way that might be appropriate.

Very truly yours,



E. Robert Stuhlmiller  
President

ERS/sdr

cc: Valley Long, Walla Walla County FB President  
Bob Warren, Columbia County FB President  
Don Ahrenholtz, Executive Vice President, WSFB  
Dean Rainwater, Legislative Director, WSFB

Another area that should receive emphasis for habitat programs, both short and long term, is on project lands that the Corps presently owns adjacent to the river.

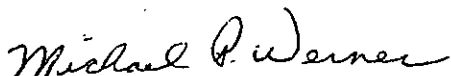
Wildlife photography, bird-watching and sightseeing are gaining in popularity. These activities should also be stressed in addition to hunting as very worthwhile returns for money expended in the compensation program.

The degree of access should vary for the habitat areas acquired in fee and through easements. All areas should not be readily accessible for public use. Access should be provided, however, it should offer a challenge to the recreationists to utilize some of the areas. The tops of draws or side canyons may be one example of good habitat potential, but not easily accessible.

In Whitman County we have lost one of most, if not the most, natural areas available for wildlife habitat - the Snake River and its riparian vegetation. In addition, the south eastern corner has had extensive relocation work conducted along the shoreline. Consequently, the habitat along the Snake River has been seriously reduced and that coupled with a general lack of public land in Whitman County (96% privately owned) creates a situation placing our wildlife populations in jeopardy. I feel strong consideration and emphasis should be given to Whitman County in the compensation program for fish and wildlife.

Again, I would like to express my appreciation for an opportunity to review the document. If I can be of further assistance, please contact me.

Sincerely.



Michael P. Werner, Director  
Whitman County Parks and Recreation

MPW:sm

cc: Whitman County Sportsmen Association  
Tony de la Torre, Washington State Game Department  
Whitman County Commissioners  
Whitman County Regional Planning Office

WHITMAN COUNTY

# Park and Recreation Board

Colfax, Washington 99111



March 27, 1975

Nelson P. Conover  
Colonel, CE  
District Engineer  
Department of the Army  
Walla Walla District, Corps of Engineers  
Bldg. 602, City-Council Airport  
Walla Walla, Washington 99362

Dear Colonel Conover:

I would like to thank you for the opportunity to review the Draft Environmental Impact Statement for the Lower Snake River Fish and Wildlife Compensation. My basic comment is to express support and commend you and your staff for the plans to provide some compensation for the fish and wildlife losses due to influences of the four dam projects on the Lower Snake River. This compensation is badly needed to replace and enhance the fish and wildlife resources of the river area and adjacent lands.

Some of my specific comments are as follows:

Page 1-3-a and b: I strongly agree with land acquisition on a willing-seller basis. The problem that appears is an apparent lack of funds allocated for habitat improvement and subsequent maintenance of the 10,000 and 15,000 acres of easement lands. I realize that this habitat program is only feasible if approved by the landowners, however, the key to wildlife populations in this area will be habitat availability. If there are not sufficient funds allocated and available in the initial phase and for future habitat development and maintenance, then I feel the program would be jeopardized. Consideration should be given to higher payments for easements authorizing habitat development.

Page 1-9-b: I feel it would be in the best interest of the site, the wildlife, and the recreation users, to offer numerous small parcels, comprising a minimum of 500 acres, and adding more acreage, if available, and financially feasible. The smaller parcels should be selected and located in such a manner as to



provide optimum habitat for wildlife and equitable distribution throughout the area for the recreationists. The smaller parcels with proper location would serve to reduce use impact by hunters (hunting pressure) and provide opportunities for visual sightings by wildlife photographers, bird-watchers and sightseers.

Page 1-9-b: I would question the necessity to limit the funding for ten years. The life of the projects are much longer than that period and the recreation needs for such compensation is as long or longer.

In the description and location of the thirty-one habitat areas for the Lower Snake River, there was an area from Wawawai to the Whitman County/Nez Perce County boundary without any areas designated as wildlife habitat. I realize that there is a very limited amount of land adjacent to the reservoir available in these areas; however, there are many side canyons with some potential for habitat improvement. This area receives a high concentration of recreational use for both hunting activities and photography/sightseeing. The development of the recreational areas at Wawawai Bay, Wawawai Landing, Blyton, and Sugarloaf, together with the new road system, will serve to greatly increase this area's attraction for recreational use. Emphasis should be placed on habitat development in this area. I would project that this area has one of the highest concentrations of recreational use as can be found along the Lower Snake River (outside of developed sites).

Some of my general comments are:

It would help to clarify the status and responsibilities of the agencies involved in the various phases of the fish and wildlife compensation plan, if a flow chart were developed to depict:

1. The stages at which responsibilities were turned over to other federal and state agencies from the Corps of Engineers.
2. The specific responsibilities, both short and long term, of each agency involved.
3. The emphasis of each phase and funding allocated.

There is an area which presently supports fair wildlife population at Central Ferry and immediately upstream. I feel this area should also be designated as a wildlife habitat area and so managed.

I am not qualified to assess the ability of the Palouse River in Whitman County for stocking, however, strong consideration and study should be given to it as a river for rainbow trout stocking. With the loss of the anadromous fishing, there remains only bass and crappie type fishing. Whitman County, will not receive any direct, tangible benefits from the fish compensation aspect within the county itself.

V. THE CORPS IMPROPERLY SEEKS TO VEST A STATE AGENCY WITH AUTHORITY TO ADMINISTER A FEDERAL PLAN.

The draft EIS proposes to establish authority in the Washington State Game Department to negotiate land transactions and administer the plan. Nowhere, however, does the Corps explain how it can effectively vest such power in a state agency. It also fails to describe how this state administrative structure is to be budgeted and how its funds will be expended. This Board firmly believes that any plan failing to accommodate questions dealing with authority and financing is simply too incomplete to comprise a valid proposal.

VI. NO VIABLE MITIGATION PLAN CAN BE DEVELOPED UNTIL AN ACCURATE APPRAISEMENT OF LOSSES IS COMPILED.

This Board feels that the mitigation proposals offered by the Corps have been developed without the benefit of an accurate appraisal of wildlife populations and habitat conditions in the project area. The Board is reinforced in this position by the attached letter of Director Carl N. Crouse of the Washington State Game Department. The failure of the Corps to accumulate persuasive pre-dam construction and post-dam construction scientific data renders any mitigation proposal so arbitrary as to be utterly meaningless.

VII. ACQUISITION OF PUBLIC ACCESS EASEMENTS ALONG THE LOWER SNAKE RIVER MAKE IT UNNECESSARY TO ACQUIRE ACCESS EASEMENTS ON TRIBUTARY STREAMS.

Public access rights to the Lower Snake River were very limited prior to initiation of the dam projects. These access rights were increased many fold with the outright purchase of over 40,000 acres of land on the Snake for public useage. In spite of this dramatic increase in public access rights, the draft EIS seeks to acquire similar rights along 150 miles of streambanks on tributaries to the Snake. This demand lacks any showing of genuine need and would constitute an unnecessary governmental infringement on private landowners along the tributaries if enacted. This Board is firmly opposed to any plan which unnecessarily diminishes the rights of private landowners.

The Columbia County Board of Commissioners has worked hard to keep abreast of environmental laws and programs. Our local efforts includes such things as land use planning programs, flood control programs, the formation of weed control districts, strict control of subdivision activity, and comprehensive solid waste management. State and federal programs which complement efforts to maintain the high quality of life in Columbia County will be steadfastly supported by this Board.

However, this Board stands firmly opposed to any plan such as the one which Corps has produced regarding wildlife mitigation when such a plan is clearly illegal, illogical and unnecessary.

*Vernon Mall*

## RESUME

The U. S. Army Corps of Engineers has authorized the preparation of a draft environmental impact statement (EIS) which attempts to justify a plan to mitigate alleged fish and wildlife losses ensuing from the construction of four dam projects on the Lower Snake River. The mitigation plan would significantly affect local governments, private landowners and the general public.

The Board of Commissioners of Columbia County is firmly opposed to this proposed mitigation plan developed by the Corps. This Board feels that the EIS and the proposed plan were developed in disregard of many procedural considerations required by law. The Corps has not utilized available input from local governments and citizenry in reaching the decisions recommended in the plan. The Corps has also failed to base its determinations on accurate scientific data and the plan espouses demands which are not based on valid needs.

This Board feels that the proposed plan is unlawful, illogical and unnecessary. This Board further regards the major concepts described in the plan as ill-conceived bureaucratic efforts which will result in impairment of the rights of local government, private landowners and the public at large. The position of this Board is further delineated in the enclosed open letter to Col. Conover of the U. S. Army of Engineers.

RECEIVED  
COLUMBIA COUNTY COMMISSIONERS  
James M. Becken  
Columbia County Board  
April 11, 1975  
James M. Becken  
Columbia County Board  
April 11, 1975  
James M. Becken  
Columbia County Board  
April 11, 1975